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ECHA
P.O. Box 400
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Subject: Veto against the Restriction and Potential Banning of PFAS in Industries

Dear madam and sir,

I am writing to express our deep concern regarding the proposed restriction and potential banning of per- and polyfluoroalkyl substances (PFAS) in industries such as ours at Brandes GmbH. While we acknowledge the importance of environmental and safety regulations, we firmly believe that a complete ban on PFAS without considering the critical role they play in our monitoring systems would have detrimental consequences for our industry and the safety of our operations.

Brandes GmbH has been at the forefront of supplying internally developed security systems to detect, report, and locate leaks within technical systems and buildings for over five decades. Our cutting-edge technology has consistently delivered unmatched measurement precision, allowing us to prevent and mitigate potential risks associated with liquid leaks in various application areas, including overground and underground pipelines for local and district heating and cooling, as well as pipework, containers, and tanks in sensitive environments.

Our monitoring systems, including the revolutionary NiCr sensor technology, have not only safeguarded the environment and employee safety but have also protected the reputation of plant operators across the industry. The success of our systems lies in their high degree of automation, central monitoring, control, and visualization capabilities, which enable us to detect and locate leaks early, thus avoiding substantial repair costs and ensuring the long-term availability and reliability of critical equipment.

One of our most significant achievements is the BS-NICR resistance locating process, designed specifically for plastic casing pipes. This technology has been instrumental in identifying moisture in pipework insulation early and accurately, offering automatic reporting to central monitoring units. Furthermore, we have consistently set industry standards, exemplified by our IntCon technology, which ensures the integrity and consistency of measurement results, enhancing the security of monitoring systems.



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It is crucial to note that PFAS have played a pivotal role in the effectiveness of our monitoring systems, particularly in leak detection within plastic casing pipes. The so-called "Nordic system," integrating uninsulated copper wires into insulation materials, has been an integral part of our technology for over five decades. While we recognize that alternative solutions exist, these alternatives often lack the consistent and reproducible measurement properties that our systems offer, ensuring the highest quality and reliability.

The proposed restrictions and potential banning of PFAS would not only disrupt our well-established systems but would also pose significant challenges in locating defects within hierarchical systems, where manual intervention would become necessary. However, we understand the growing concerns about PFAS and are committed to exploring alternative, environmentally friendly solutions that meet or exceed the stringent quality requirements Brandes GmbH is known for.

In response to the evolving landscape and demands from network providers, we have proactively developed the "T-system" to automate plant operations fully. This innovative solution allows for centralized monitoring while enabling targeted checks for leaks and pipe breaks in all branches (hierarchies), eliminating the need for manual control measurements and ensuring precise reporting to districts and streets.

In conclusion, while we share the common goal of environmental protection and safety, we urge you to reconsider the potential banning of PFAS without thoroughly assessing the critical role they play in our industry's safety and monitoring systems. We are committed to collaborating with regulatory bodies to find sustainable alternatives and ensure the continued safety and reliability of our operations.

Thank you for your attention to this matter. We look forward to engaging in a constructive dialogue to address these concerns and explore mutually beneficial solutions.

Sincerely,

Jörg Bartsch
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